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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,)	CASE NO. 4:21-cr-00429-YGR
Plaintiff,)	UNITED STATES' WITNESS LIST
v.)	
RAY J. GARCIA,)	
Defendant.)	

The United States respectfully submits the following list of witnesses it may call at a trial of this matter, along with a brief summary of their anticipated testimony on direct examination. Only the initial of current and former FCI Dublin inmates have been used to protect their privacy and ensure their safety. The government has informed the defense of the full names of these witnesses. Leave is respectfully requested to amend this list as circumstances may change.

1 DATED: October 27, 2022

Respectfully submitted,

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4 /s/ Andrew Paulson
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WITNESS NAME	SUMMARY OF DIRECT EXAMINATION
Victim 1	Victim 1 will testify that Garcia digitally penetrated her genital opening on multiple occasions and touched her genitalia and breasts. She will also testify that Garcia instructed her to strip naked for him, and that he took pictures of her while she was naked. Victim 1 will further testify that Garcia showed her pictures of his penis on multiple occasions.
Victim 2	Victim 2 will testify that Garcia caused Victim 2 to touch his penis and that Garcia touched Victim 2's breasts. She will also testify that Garcia instructed Victim 2 to be naked for him when he did his rounds, and that she obeyed this instruction on multiple occasions. Victim 2 will further testify that Garcia showed her pictures of his penis.
Victim 3	Victim 3 will testify that Garcia kissed her and touched her buttocks on one occasion while she was at FCI Dublin. She will also testify that on multiple occasions Garcia showed Victim 3 pictures of his penis. Additionally, Victim 3 will testify that after she was released from FCI Dublin, she and Garcia had a video chat during which Garcia instructed her to undress.
J.A.	J.A. will testify that she was Victim 1's cellmate and about her observations of the interactions between Garcia and Victim 1. She will also testify that Garcia asked J.A. to leave the cell when he was in the cell alone with Victim 1.
FBI Special Agent (SA) Katherine Barclay	SA Barclay will testify about the execution of the search warrants on Garcia's home, vehicle, and office at FCI Dublin, and the items found during those searches. She will also testify about the various items found on Garcia's electronic devices, including photos of Victim 1 and Victim 3 and photos of Garcia's penis. SA Barclay will also testify about certain Google and TracFone records for accounts and devices that Garcia used to communicate with Victim 3 after her release from FCI Dublin. Finally, SA Barclay will testify about the recorded interview she conducted with Garcia on July 22, 2021.
R.B.	R.B. will testify that she observed Garcia stop and look in Victim 1's cell when he was doing rounds. R.B. will also testify that Victim 1 told her about Victim 1's relationship with Garcia, and that Garcia approached R.B. and asked her to keep Victim 1 calm when Victim 1 was upset with Garcia.
Y.C.	Y.C. will testify that she was cellmates with Victim 2 and that she observed Garcia standing outside their window. She will further testify that Garcia came to their cell almost daily, and that Victim 2 asked Y.C. to leave when Garcia did his rounds. Y.C. will also testify that Victim 2 told Y.C. that Victim 2 had undressed for Garcia.

K.D.	K.D. will testify that Garcia instructed her to strip naked for him when he did his rounds, and that she complied with this instruction on multiple occasions.
K.H.	K.H. will testify that Victim 1 told her about Victim 1's relationship with Garcia, and that Garcia took pictures of Victim 1.
FBI Digital Forensics Examiner (DFE) Michael Kan	Consistent with the expert disclosure in this case, and as detailed in DFE Kan's September 19, 2022 report, DFE Kan will testify regarding his forensic analysis of certain items found on Garcia's personal computer, BOP cellphone, and personal cellphone.
Dr. Meagan Malespini (BOP)	Dr. Malespini will testify regarding the contents of BOP's Prison Rape Elimination Act trainings that Garcia attended and/or taught. She will also testify regarding certain training records for Garcia.
M.M.	M.M. will testify that Garcia instructed her to strip naked and dance for him when he did his rounds, and that she obeyed that instruction on multiple occasions.
BOP Correctional Officer Stephanie Milliken	CO Milliken will testify regarding her observations of Garcia's interactions with Victim 1 and conversations she had with Garcia regarding Victim 1. She will also testify regarding background related to FCI Dublin, the role and responsibilities of the warden and associate warden at FCI Dublin, and the process for transfers and compassionate relief requests. She will also testify about FCI Dublin's training and requirements related to PREA.
A.Q.	A.Q. will testify that she observed Garcia standing outside Victim 2's cell on multiple occasions and that on at least one occasion he appeared to be holding a cellphone. She will also testify that Victim 2 confided in her regarding her relationship with Garcia.
G.R.	G.R. will testify that she was cellmates with K.D. and that Garcia would frequently stop by their cell. She will also testify that she overheard Garcia make sexual comments about K.D.
S.S.	S.S. will testify that S.S. saw Garcia standing near a window on the back side of a housing unit moving his pelvis at the window. S.S. will further testify that S.S. saw Garcia standing in the doorway of Victim 2's cell and that Victim 2 was inside the cell wearing a robe that exposed her breasts, torso, and genitals.
T.T.	T.T. will testify that she saw Garcia watch Victim 3 exercise at FCI Dublin. She will also testify that Victim 3 told her about her relationship with Garcia. T.T. will further testify about statements that Garcia made about Victim 3, and that she observed Garcia speaking with Victim 2.
Cynthia Townsend (BOP)	Ms. Townsend will testify that Victim 1 was visibly anxious when she saw Garcia walk by the day of the education apprenticeship graduation. She will also testify that she told Victim 1 to contact Victim 1's attorneys about any concerns at FCI Dublin.

1 C.V.

C.V. will testify that Garcia approached her from behind and grabbed her buttocks without her permission. She will also testify that Garcia made sexual comments to her and told her that he wanted C.V. to dance for him.